

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JLK SYSTEMS GROUP, INC., *et al.*,

Plaintiffs,

v.

PIONEER CORPORATION, *et al.*,

Defendants.

Case No. 3:14-cv-03748-RS

MDL No. 2143

This Document Relates to:

Case No. 3:10-md-02143 RS

IN RE OPTICAL DISK DRIVE ANTITRUST
LITIGATION

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING CASE
MANAGEMENT CONFERENCE AND
RESPONSE TO COMPLAINT**

STIPULATION

WHEREAS, on August 18, 2014, Direct Purchaser Plaintiffs (“DPPs”) filed a class action complaint against Pioneer Corporation, Pioneer High Fidelity Taiwan Co., Ltd., Pioneer North America, Inc., and Pioneer Electronics (USA) Inc., in *JLK Systems Group, Inc., et al. v. Pioneer Corporation, et al.*, Case No. 3:14-cv-03748-LB (the “*JLK Action*”).

WHEREAS, on August 25, 2014, this Court entered an order deeming the *JLK Action* related to *In re Optical Disk Drive Products Antitrust Litigation*, Case No. 3:10-MD-2143-RS (the “*ODD Litigation*”) and transferring the *JLK Action* to this Court. (*ODD Litigation*, ECF No. 1396).

WHEREAS, on September 2, 2014, Pioneer North America, Inc. and Pioneer Electronics (USA) Inc., were served in the *JLK Action*, making their response to the *JLK Action* complaint due on or before September 23, 2014.

WHEREAS, the parties have previously stipulated and the Court has approved extensions in the time by which Pioneer North America, Inc. and Pioneer Electronics (USA) Inc. must respond to the complaint in the *JLK Action*, making the current response due on or before November 24, 2014, so that the parties could meet and confer regarding several issues, such as consolidation of the *JLK Action* and the *ODD Litigation*, service of process and discovery.

WHEREAS the Court previously set a Case Management Conference in the *JLK Action* for November 13, 2014, and the Court recently set a Case Management Conference in the *ODD Litigation* for January 29, 2015.

WHEREAS the parties continue to meet and confer regarding several issues, they wish to extend the date by which Pioneer North America, Inc. and Pioneer Electronics (USA) Inc. must respond to the *JLK Action* complaint, and they wish to consolidate the Case Management Conference in the *JLK Action* with the Case Management Conference in the *ODD Litigation*.

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties as follows:

1. The Case Management Conference set in the *JLK Action* for November 13, 2014 shall be taken off calendar and consolidated with the Case Management Conference in the *ODD*

1 *Litigation*, which is scheduled to take place on January 29, 2015; and

2 2. The response of Pioneer North America, Inc. and Pioneer Electronics (USA) Inc.
3 to the complaint in the *JLK* Action is due on or before February 28, 2015, 30 days from the Case
4 Management Conference scheduled in the *ODD Litigation*.

5 IT IS SO STIPULATED.

6
7 Dated: November 6, 2014

SAVERI & SAVERI, INC.

8 By: /s/ Cadio Zirpoli
9 Cadio Zirpoli

10 Counsel for
11 DIRECT PURCHASER PLAINTIFFS

12 Dated: November 6, 2014

JONES DAY

13 By: /s/ Eric P. Enson
14 Eric P. Enson

15 Attorneys for Defendants
16 PIONEER NORTH AMERICA, INC. AND
17 PIONEER ELECTRONICS (USA) INC.

18
19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20
21 Dated: 11/7/14

22 
23 HONORABLE RICHARD SEEBORG
24 UNITED STATES DISTRICT COURT JUDGE
25
26
27
28

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)

I, Cadio Zirpoli, attest that concurrence in the filing of this document has been obtained from all signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 6, 2014, at San Francisco, California.

/s/ Cadio Zirpoli